

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

GIBSON BRANDS, INC.,

Plaintiff/Counterclaim-Defendant,

v.

ARMADILLO DISTRIBUTION  
ENTERPRISES, INC.; CONCORDIA  
INVESTMENT PARTNERS, LLC,

Defendants/Counterclaim-Plaintiffs,

DOES 1 through 10,

Defendants.

Case No. 4:19-cv-00358-ALM

**UNOPPOSED MOTION TO SEAL DEFENDANTS'  
TRIAL DEPOSITION DESIGNATION**

Comes now Armadillo Distribution Enterprises, Inc. (“Armadillo”), by and through its attorneys of record, and files this Unopposed Motion to Seal Defendants’ Trial Deposition Designation. In support of this motion to seal, Defendants state as follows:

This is a trademark case involving highly confidential information to Defendants Armadillo and Concordia, as well as Plaintiff Gibson Brands, Inc. and a number of third parties. To address this issue, the parties agreed to, and the Court entered, a protective order limiting the disclosure of certain confidential information [Dkt. #52]. As set forth in the parties’ protective order, information marked “Highly Confidential Outside Attorneys’ Eyes Only” includes “trade secrets within the meaning of the Defend Trade Secrets Act and all information and materials that the disclosing party has reasonable grounds to believe would, if known to any officer, director,

employee, or agent of a receiving party, or to the public, lead to significant harm or injury to the reputation and/or business of the disclosing party or provide improper advantage to others” [Dkt. #52 at ¶ 2].

The information that Defendants refer to and are filing in its trial deposition designations and the supporting information and materials attached thereto are in some cases designated “Highly Confidential – Attorney’s Eyes Only” and are not publicly available. Defendants’ opposition thereto likewise necessarily discusses this same information, as well as confidential deposition testimony taken in this case. While relevant to the issues before the Court, if this information were to be disclosed to the public it could lead to significant harm or injury to the business of the parties and various third parties and could give others an improper competitive or business advantage. Plaintiff Gibson Brands, Inc. is unopposed to the relief requested in this motion to seal.

Accordingly, Armadillo respectfully requests that the Court grant this motion and permit Defendants’ Trial Deposition Designations to be sealed pursuant to the Court’s protective order.

Dated: May 25, 2022

Respectfully submitted,

/s/ Anna Naydonov

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*Attorneys for Armadillo Distribution Enterprises,  
Inc. and Concordia Investment Partners, LLC*

**CERTIFICATE OF CONFERENCE**

I, the undersigned, hereby certify that on the 25th day of May, 2022, counsel for Defendants conferred with counsel for Plaintiff Gibson Brands, Inc., who indicated that Plaintiff was unopposed to the relief requested herein.

/s/ Emileigh S. Hubbard  
Emileigh S. Hubbard

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on the 25<sup>th</sup> day of May, 2022, a copy of the foregoing document was served on all counsel of record via this Court's CM/ECF electronic filing system.

/s/ Emileigh S. Hubbard  
Emileigh S. Hubbard